

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SECURITIES AND EXCHANGE COMMISSION	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
VLADIMIR OKHOTNIKOV,	)	
JANE DOE a/k/a LOLA FERRARI,	)	
MIKAIL SERGEEV,	)	
SERGEY MASLAKOV,	)	Case No. 22 C 3978
SAMUEL D. ELLIS,	)	
MARK F. HAMLIN,	)	Judge Jorge L. Alonso
SARAH L. THEISSEN,	)	
CARLOS L. MARTINEZ,	)	
RONALD R. DEERING,	)	
CHERI BETH BOWEN, and	)	
ALISHA R. SHEPPERD,	)	
	)	
Defendants.	)	
	)	

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**PLAINTIFF’S AGREED MOTION FOR ENTRY OF  
PARTIAL JUDGMENT BY CONSENT AS TO DEFENDANT RONALD R. DEERING**

Plaintiff Securities and Exchange Commission respectfully moves the Court for entry of Partial Judgment by Consent as to Defendant Ronald R. Deering (“Deering”).

In support of this motion, the SEC shows the Court as follows:

1. The SEC filed its Complaint in this matter on August 1, 2022 (Dkt# 1) alleging, among other things, violations of the registration and antifraud provisions of the federal securities laws – specifically, Sections 5 and 17(a) of the Securities Act of 1933, 15 U.S.C. §§ 77e, 77q(a); and Section 10(b) and Rule 10b-5 of the Securities Exchange Act of 1934, 15 U.S.C. § 78j(b), 17 C.F.R. § 240.10b-5.

2. The SEC filed prior Agreed Motions on August 2, 2022 (Dkt# 5), August 10, 2022 (Dkt# 17), September 1, 2022 (Dkt# 29), November 21, 2022 (Dkt# 62), and November 22, 2022 (Dkt# 67), seeking entry by consent of a final judgment as to Defendant Samuel D. Ellis (“Ellis”), and partial judgments by consent as to Defendants Sarah L. Theissen (“Theissen”), Mark F. Hamlin (“Hamlin”), Cheri Beth Bowen (“Bowen”), Carlos L. Martinez (“Martinez”), and Alisha R. Shepperd (“Shepperd”). By Minute Entries on August 4, 2022 (Dkt# 8), August 25, 2022 (Dkt# 24), September 2, 2022 (Dkt# 31), and November 22, 2022 (Dkt# 70), the Court granted the prior Agreed Motions, and subsequently, on August 8, 2022, August 25, 2022, September 2, 2022, November 22, 2022, and December 8, 2022, the Court entered final judgment against Ellis (Dkt# 16), and partial judgments against Theissen (Dkt# 15), Hamlin (Dkt# 25), Bowen (Dkt# 33), Martinez (Dkt# 71), and Shepperd (Dkt# 77).

3. As with Theissen, Hamlin, Bowen, Martinez, and Shepperd, Deering also has agreed to a partial settlement of the SEC’s claims. Attached as Exhibit 1 is his signed consent to the proposed partial judgment. This judgment obviates the need to litigate substantive liability on the part of Deering, and permanently enjoins him from violating the federal securities laws at issue in the Complaint as well as from engaging in certain other activity. The proposed judgment further provides that monetary relief sought by the SEC – in the form of disgorgement, prejudgment interest, and a civil penalty – shall be determined by the Court at a later date on the SEC’s motion.

4. District courts routinely have entered judgments based on this type of “bifurcated” settlement in SEC enforcement actions, and have adopted the procedures described in the attached consent for the monetary relief portion of the proceedings. *See, e.g., SEC v. Daubenspeck*, 469 F. Supp. 3d 859, 860 (N.D. Ill. 2020); *SEC v. Zenergy Int’l, Inc.*, No. 13-

5511, 2016 U.S. Dist. LEXIS 127630, at \*2-4 (N.D. Ill. Sept. 20, 2016); *SEC v. Integrity Fin. AZ, LLC*, No. 10-782, 2012 U.S. Dist. LEXIS 6758, at \*3-4 (N.D. Ohio Jan. 20, 2012).

5. In the attached consent, Deering has agreed the SEC “may present the [proposed judgment] to the Court for signature and entry without further notice.” (*See* Ex. 1, at ¶ 15.) Under Fed. R. Civ. P. 54(b), there is no just reason to delay entry of the proposed judgment, and the SEC submits entry of the judgment will conserve judicial resources and streamline the issues in this litigation. In addition, there is little risk of a piecemeal appeal, as Deering has waived his right to appeal from the judgment. (*See* Ex. 1, at ¶ 7.)

6. This case will proceed in full as to the remaining Defendants – Vladimir Okhotnikov and Mikail Sergeev – and is not affected by entry of the proposed judgment.<sup>1</sup>

7. Pursuant to the Court’s Individual Practices, the proposed judgment in Word format is being emailed separately to Chambers.

WHEREFORE, for the reasons cited above, the SEC respectfully requests the Court grant this motion and enter the proposed judgment.

DATED: December 9, 2022

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

By /s/ Patrick R. Costello

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<sup>1</sup> Defendants Jane Doe a/k/a Lola Ferrari and Sergey Maslakov are in default, and the SEC has moved for default judgment against them (Dkt# 49).

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**CERTIFICATE OF SERVICE**

I certify that on December 9, 2022, I caused to be served the foregoing PLAINTIFF'S AGREED MOTION FOR ENTRY OF PARTIAL JUDGMENT BY CONSENT AS TO DEFENDANT RONALD R. DEERING on Defendants at the addresses and by the means set forth on the attached Service List.

/s/ Patrick R. Costello

Patrick R. Costello

**Service List**

<p><b>Vladimir Okhotnikov</b>  c/o James G. Lundy  Foley &amp; Lardner LLP  321 North Clark Street, Suite 3000  Chicago, IL 60654  <a href="mailto:jglundy@foley.com">jglundy@foley.com</a></p> <p>Sergei Kuchinski  Kuchinski Law Group, LLC  211 West Wacker Dr., Suite 300  Chicago, IL 60606  <a href="mailto:sergei@kuchinskilawgroup.com">sergei@kuchinskilawgroup.com</a></p> <p>Sami Azhari  Azhari LLC  134 N. Lasalle Street, Suite 444  Chicago, IL 60602  <a href="mailto:sazhari@azharillc.com">sazhari@azharillc.com</a></p>	By CM/ECF
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<p><b>Carlos L. Martinez</b>  c/o Bruce Lewitas  Lewitas Hyman  161 N. Clark St., Suite 1600  Chicago, IL 60601  <a href="mailto:blewitas@securitieslaw.com">blewitas@securitieslaw.com</a></p>	By electronic mail

<b>Ronald R. Deering</b> c/o Peter King and Cindy Innocent Guerra King P.A. The Towers at Westshore 1408 N. Westshore Blvd., Suite 1010 Tampa, FL 33607 <a href="mailto:pking@guerraking.com">pking@guerraking.com</a> <a href="mailto:cinnocent@guerraking.com">cinnocent@guerraking.com</a>  David A. Baugh O'Hagan Meyer, LLC One E. Wacker Drive, Suite 3400 Chicago, IL 60601 <a href="mailto:dbaugh@ohaganmeyer.com">dbaugh@ohaganmeyer.com</a>	By CM/ECF
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